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11 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,  
12 ROBERT VACCARI, and JAKE ADAMS

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:*  
*Hon. Kenly K. Kato – Courtroom 3*

15 L.C., a minor by and through her  
16 guardian *ad litem* Maria Cadena,  
17 individually and as successor-in-interest  
18 to Hector Mr. Puga; I.H., a minor by  
19 and through his guardian *ad litem*  
20 Jasmine Hernandez, individually and as  
21 successor-in-interest to Hector Mr.  
22 Puga; A.L., a minor by and through her  
23 guardian *ad litem* Lydia Lopez,  
24 individually and as successor-in-interest  
25 to Hector Mr. Puga; and ANTONIA  
26 SALAS UBALDO, individually,

27 Plaintiffs,

28 vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISIAH KEE;  
MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 6-10, inclusive,

Defendants.

Date: May 15, 2025  
Time: 9:30 a.m.  
Courtroom: 3

*Trial Date: June 2, 2025*

*Complaint filed: 06/07/2022*  
*FAC filed: 10/18/22*  
*SAC filed: 01/13/23*  
*TAC filed: 05/12/23*

**DECLARATION OF AMY R. MARGOLIES**

I, Amy R. Margolies, do state and declare as follows:

1. I am an attorney at law duly licensed to practice before this Court and am a Partner in the law firm of Lynberg & Watkins, P.C., attorneys of record for Defendants County of San Bernardino, Robert Vaccari, and Jake Adams in the above-captioned matter. I have personal knowledge of the facts stated herein, except those stated upon information and belief, and as to those matters, I believe them to be true. If called upon to testify to the matters herein, I could and would competently do so.

2. Attached hereto as Exhibit "A" is a true and correct copy of the relevant portions of Betzabeth Gonzalez's deposition.

3. Attached hereto as Exhibit "B" is a true and correct copy of the relevant portion of Annabelle Botten's deposition.

4. During the meet and confer process, Defendants requested that Plaintiffs agree to exclude lay witness opinions such as Ms. Gonzalez's and Ms. Botten's speculative opinions as set forth in their depositions. Plaintiffs would not agree and therefore their refusal necessitated this Motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this April 17, 2025, at San Diego, California.

DATED: April 17, 2025

**LYNBERG & WATKINS**  
A Professional Corporation

By: /s/ Amy R. Margolies  
**SHANNON L. GUSTAFSON**  
**AMY R. MARGOLIES**  
Attorneys for Defendant,  
COUNTY OF SAN BERNARDINO  
ROBERT VACCARI, and JAKE ADAMS